

In the United States District Court
For the Middle District of Pennsylvania

James H. Williams
Plaintiff

Civil No # 1:CV-01-280

v/s

Richard L. Spade
Defendant

Judge Kane

Plaintiff's First set of Interrogatories to
Defendants

Pursuant to Rule 33 of the Federal Rules of Civil Procedures
and order of this Court dated April 26, 2004.

Plaintiff James H. Williams, pro se. (hereinafter Plaintiff)
hereby requests that Defendants answer the following interrogatories
under oath, in accordance with the Definitions and Instructions set
forth below, within thirty (30) calendar days after service of
these interrogatories.

Definitions and Instructions

A) As used herein, the term "document" means every typed
of recorded, information dated or prepared prior to or subsequent to
this action, including but not limited to any memorandum, note, report,
letter, correspondence, message, record, instruction, case assignment,
order, policies, procedures, regulations, directives and any other
written, recorded, electronic, however produced or reproduced and,
in the absence of the original, a copy thereof and any copy bearing
markings not present on the original or other copy thereof.

(b) The word "incident" includes the circumstances and
events surrounding the alleged denial of 8th Amendment violation
to Plaintiff

- And other occurrences giving RAISE to this ACTION.

(c) the word "identify" as used with respect to any documents is understood to mean the following:
1) Title; 2) DATE; 3) NAME AND POSITION OF ORIGINATOR
4) NAME AND POSITION OF ANY AND ALL RECIPIENTS; 5) NAME AND POSITION OF ANY OTHER PERSON WHO RECEIVED COPIES OR ANY PORTION OF THE DOCUMENT IN QUESTION; 6) DESCRIPTION OF THE DOCUMENT SUBJECT, MATTER AND CONTENTS; 7) LOCATION OF THE DOCUMENT; 8) NAME AND POSITION OF THE CUSTODIAN OF THE DOCUMENT.

(d) the word "identify" as used with respect to any person is understood to mean the following information is to be provided
1) FULL NAME; 2) PRESENT OR LAST KNOWN BUSINESS ADDRESS
3) OCCUPATION AND TITLE; AND 5) PRESENT OR LAST KNOWN EMPLOYER.

INTERROGATORIES

of Plaintiff's 1. Identify ANY AND ALL documents relating to the release being returned to MR. SPAIDE UNIT MANAGER block after Plaintiff served 60 days disciplinary for threatening Defendant

2. Identify ANY AND ALL statement made by MR. SPAIDE (Defendant) before AND AFTER the incident of Feb 8, 1999 ASSAULT (objection) Plaintiff being returned back to his block.

3. Identify ANY AND ALL investigation relating to threatening M.C.H.A -125751 Against Defendant.

4. Identify ANY AND ALL policy and procedures concerning when an inmate threaten staff, specifically, Separation procedures used to avoid harm.

5. Identify ANY AND ALL S.C.I. MAHANOY policies relating to Z-block Rules and Regulation AND policies of DC-ADM 801, 802 AND DC-ADM 804 while at Mahanoy between JAN 97 thru Feb 8, 99.

6. Identify ANY documents related to ANY complaint, grievance, criticism, censure, reprimand or rebuke directed toward Defendant SPAIDE prior to or subsequent to the incident giving rise to this proceeding

DATE May 17, 2004

(2)

by James Williams pro se
JAMES WILLIAMS AY-8692
175 Progress DR
Wappensburg, PA. 15370

In the United States District Court
For the Middle District of Pennsylvania

James H. Williams
Plaintiff

Civil No[#] 1:cv-01-280

vs

Richard L. Spade
Defendant

Judge Kane

Certificate of Service

I, JAMES H. WILLIAMS pro se, hereby certify that on May 20, 2004, I served a true and correct copy of Plaintiff's First Request for Documents and Plaintiff's First set of Interrogatories to Defendants.

By causing it to be deposited in the United States Mail, first-class postage pre-paid to the following:

Linda S. Lloyd (P.A.G.)
15th Floor, STRAWBERRY SQUARE
Litigation Section
HARRISBURG, PA. 17120

Dist. Judge Yvette Kane
U.S. District Court
Middle Dist of PA.
228 Walnut St
P.O. Box 983
Harrisburg, PA. 17108

Date May 20, 2004

By James H. Williams pro se

JAMES WILLIAMS AY-8692
175 PROGRESS DRIVE
WAGNESSBURG, PA. 15370

In the United States District Court
For the Middle District of Pennsylvania

To: MARY E. D'Andrea
Clerk of Court
U.S. Dist Ct Middle Dist PA
235 North Washington Ave
Scranton, PA. (P.O. Box 1148)
18501-1148

JAMES WILLIAMS A#8692
175 PROGRESS DR.
McKeesport, PA. 15370

May 20, 2004

RE: Williams vs Spade
Civil # 1:cv-01-280

Dear D'Andrea:

Enclose please find one (1) original and one (1) copy of Plaintiff's first request for production of documents and Plaintiff's first set of interrogatories to Defendants for filing with your office. Pursuant to this Court order dated April 26, 2004.

Thank you very much.
James Williams